

June 2, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: MM Docket No. 99-325

Dear Ms. Dortch:

I am the station manager for KUAT-FM and KUAZ-AM/FM, non-commercial educational radio stations licensed to the Arizona Board of Regents. The stations' studios are located on the University of Arizona campus in Tucson. KUAT-FM, which broadcasts from a main transmitter and five translators, is the only source for classical music in southern Arizona. KUAZ, with AM and FM transmitters and one FM translator, is the NPR news and information station serving Tucson and southern Arizona. In addition, KUAT-FM makes use of its analog subcarrier capacity to broadcast a radio reading service for the blind and visually impaired. Every week KUAZ also broadcasts programs in the native language of the Tohono O'odham, the Native American tribe whose reservation is located west of Tucson, and in the Spanish language.

Current analog radio technology limits each of our radio stations to providing only one programming service to most listeners in our community. Digital broadcasting, with multicasting capabilities, will enable our radio stations to expand existing programming and to develop new, more varied and diverse programming formats whose

appeal may be more targeted and defined. For example, having the opportunity to utilize supplemental audio capacity (SAC) channels upon our transition to digital radio would allow our stations to provide more extensive programming for the Native American and Hispanic communities of southern Arizona. I urge the FCC to adopt service rules for radio digital audio broadcast that include SAC technology.

Beyond authorizing the use of digital radio technology to offer SAC channels, the FCC's goals will be well served by providing non-commercial educational stations with maximum flexibility to serve the needs and interests of our listeners. Public radio stations share a mission to serve the public's educational needs and have a proven track record for doing so. Public radio counts on the FCC to fully enable and protect our ability to serve that programming mission. SAC technology can provide our public radio stations with a very cost-effective means of expanding the quality and quantity of local, diverse programming. Moreover, SAC may even have the potential to be used for remunerative purposes. Public radio stations need to generate revenue to fund our activities. The possibility that SAC could be revenue producing will strengthen our ability to serve the public better in the future.

Thank you very much for your consideration. If you have questions or require additional information, please telephone me at 520-621-3163.

Sincerely,

John Kelley
Assistant General Manager for Radio
KUAT Communications Group